UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

1011025 AMINON

In re

W.R. GRACE & CO., et al.,

Chapter 11 Petition Case No. 01-01139-JKF

Debtor.		
		1

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that on February 19, 2003, Louis S. Robles, counsel for certain asbestos creditors in this matter, was suspended from the practice of law in the State of Florida by the Supreme Court of Florida. A copy of the Order entered by the Supreme Court of Florida suspending Louis S. Robles from practicing law in the State of Florida is attached hereto as Exhibit "A". On February 19, 2003, the law firms of Louis S. Robles, P.A., and The Robles Law Center, P.A. (the "Robles law firms") filed assignments for the benefit of creditors and are no longer engaged in the practice of law.

On February 20, 2003, Thomas Tew, a partner in Tew Cardenas Rebak Kellogg Lehman DeMaria Tague Raymond & Levine L.L.P., was appointed Inventory Attorney for the approximately 13,000 cases/files of Louis S. Robles and/or his affiliated entities, including The Robles Law Center, P.A. and Louis S. Robles, P.A. A copy of the Order entered by the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County appointing Thomas Tew as Inventory Attorney is attached hereto as Exhibit "B".

By Order dated March 7, 2003, the Circuit Court authorized the Inventory Attorney to engage the law firm of Tew Cardenas as his counsel, attached hereto as Exhibit "C".

Biscayne Boulevard, Suite 2600, Miami, Florida 33131.

Pursuant to the Supreme Court and the Circuit Court's orders, the Inventory Attorney has established trust accounts to receive any funds due the Robles law firms. All sums due Louis S. Robles, P.A. or the Robles Law Center, P.A. should be made payable to either the "Inventory Attorney Trust Account for Louis S. Robles, P.A.", or the "Inventory Attorney Trust Account for the Robles Law Center, P.A.", as the case may be, in the care of Tew Cardenas at 201 South

Accordingly, the undersigned counsel and law firm hereby makes their appearance in the above-captioned bankruptcy case as Inventory Attorneys on behalf of all clients of the Robles law firms. Please serve copies of all pleadings, motions, objections, responses, notices and any other court papers on the undersigned law firm.

Dated: March 20, 2003.

TEW CARDENAS REBAK KELLOGG LEHMAN DeMARIA TAGUE RAYMOND & LEVINE, LEP Court Appointed Inventory Attorneys 201 South Biscayne Boulevard, Suite 2600 Miami, Florida 33131

Telephone: (305) 536-1112

Facsimile: (305) 536-1116

Thomas Tew, Esquire Florida Bar No. 98160 Jeffrey Tew, Esquire

Florida Bar No. 121291

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Appearance was served, via U.S. regular mail, on this **20** day of March, 2003, upon: Laura Dayis Jones Fig., Pachulski Stang et al., Counsel for the Debtor, 919 N. Market Street, 16th Floor, Wilmington, DE 19899-8705; and Frank J. Perch, III, Office of the U.S. Trustee, 844 King Street, Suite 2313, Wilmington, DE 19801.

Jeffrey Tew

::ODMA\MITODMA\MIAMI;363519;1

Case 01-01139-AMC Doc 3755 Filed 03/25/03 Page 4 of 9

Supreme Court of Florida

WEDNESDAY, FEBRUARY 19, 2003

CASE NO.: SC03-214

Lower Tribunal No.: 2003-70,854(11F-MES)

THE FLORIDA BAR

vs. LOUIS STEVEN ROBLES

Complainant(s)

Respondent(s)

The Petition for Emergency Suspension filed pursuant to Rule 3-5.2 of the Rules Regulating The Florida Bar is granted and it is hereby ordered that the respondent is suspended from the practice of law until further order of this Court, and respondent (or an attorney acting on respondent's behalf) is ordered:

- a. To accept no new clients from the date of this Court's order and to cease representing any clients after 30 days.
- b. To immediately furnish a copy of respondent's suspension order to all clients and to furnish Staff Counsel of The Florida Bar with the requisite affidavit listing all clients so informed within 30 days after issuance of this Court's order.
- c. To refrain from disbursing or withdrawing any monies from any trust account without approval of the Florida Supreme Court or a referee appointed by the Florida Supreme Court.
- d. To deposit into a specified trust account all sums received from the practice of law, whether as fees, costs, deposits, or trust funds, within 30 days following the entry of the order of suspension in this case and thereafter, and to immediately advise Bar Counsel of the receipt and location of said funds.

Case No. SC03-214 Page 2

e. To immediately notify in writing all financial institutions in which respondent maintains trust accounts of the provisions of respondent's suspension and to provide said financial institutions with a copy of this Court's order, and furthermore, to provide Bar Counsel with a copy of the notice sent to each financial institution.

Not final until time expires to file motion for rehearing and, if filed determined. The filing of a motion for rehearing shall not alter the effective date of this suspension.

ANSTEAD, C.J., and WELLS, PARIENTE, LEWIS, QUINCE, CANTERO and BELL, II., concut.

A True Copy Test:

Clerk, Supreme Court

kb

Served:

JOHN ANTHONY BOGGS DAVID W. BIANCHI RANDOLPH MAX BROMBACHER NICHOLAS R. FRIEDMAN

Case 01-01139-AMC

Doc 3755

Filed 03/25/02

Page 6 of 9

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

The Florida Bar File No. 2003-70,892 (MIO-111)

In Re: PETITION FOR APPOINTMENT OF INVENTORY ATTORNEY FOR LOUIS STEVEN ROBLES

Circuit Court Case No. 03-11 CA 60

ORDER APPOINTING INVENTORY ATTORNEY

THIS CAUSE having come on to be heard upon the Amended Petition of The Florida Bar dated February 19, 2003, for appointment of an inventory attorney pursuant to Rule 1-3.8, Rules Regulating The Florida Bar and the Court being otherwise fully advised in the premises and finding that Louis Steven Robles (hereafter referred to as Robles), is a member of The Florida Bar, albeit suspended pursuant to Florida Supreme Court Order dated February 19, 2003, and that in order to protect the rights of Robles' clients, it is

ORDERED AND ADJUDGED:

- 1. That Thomas Tew, Esquire is hereby appointed as inventory attorney for Robles with full powers and duties pursuant to Rule 1-3.8. Rules Regulating the Florida Bar to carry out the function as inventory automey.
- 2. The inventory attorney is directed to proceed as soon as possible to inventory all files of Robles and to take such action as seems indicated to protect the interests of all of Robles' clients.
- 3. The inventory attorney is specifically authorized to accept employment as attorney in connection with the client matters found in the files inventoried as long as each client is given a free choice with regard to the further employment of counsel.

- 4. The inventory attorney shall not be obligated to accept employment as attorney in connection with any or all the active cases found in the files inventoried, but may, at his option, refuse to handle such files as he deems fit and proper.
- 5. The inventory attorney shall within 30 days of this order furnish a progress report to this Court with copies to The Florida Bar and shall thereafter furnish periodic progress reports as this Court may direct until completion of the duties as inventory attorney and approval of a final report by this Court.
- 6. The Clerk of this Court shall issue, upon application of the inventory attorney, such writs as may be necessary to earry out this order, upon further order of Court.
- 7. The inventory attorney shall have specific authority to have access to the records of any and all bank accounts of Robles, whether such bank account is individual, escrow, trust, estate or in any representative capacity.

DONE AND ORDERED in Miami, Miami-Dade County, Florida this 🗩

February, 2003.

JOSEPH PARINA, CHIEF JUDGE ELEVENZH JUDICIAL CIRCUIT

Copies furnished to:

Thomas Tew, Esquire

Nicholas N. Friedman, Esouire, Attorney for Louis Steven Robles

Atlene Sankel, Esquire, Bar Counsel

Randolph M. Brombacher, Esquire, Bar Counsel

Lewis B. Freeman, Principal, Lewis B. Freeman & Partners, Inc.

John A. Boggs, Esquire, Director of Legal Division, The Florida Bar-

Case 01-01139-AMC Doc 3755 Filed 03/25/03

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Page 8 of 9

THE FLORIDA BAR FILE NO. 2003-70,892 (MIO-11F)

IN RE: PETITION FOR APPOINTMENT OF INVENTORY ATTORNEY FOR LOUIS STEVEN ROBLES /

CASE NO.: 03-11 CA 60

ORDER AUTHORIZING ENGAGEMENT OF ACCOUNTING FIRM AND PAYMENT OF ADMINISTRATIVE EXPENSES

Attorney's Emergency Motion for Order Authorizing Engagement of Accounting Firm and Payment of Administrative Expenses and the Court having heard argument of counsel and being otherwise fully advised in the premises it is hereby

ORDERED AND ADJUDGED as follows:

The Inventory Attorney's Motion is granted. The Inventory Attorney is authorized to do the following during the next 30 days:

- 1. Mail notices to the clients advising them of his appointment as Inventory Attorney, the status of their case and other matters pertaining to their rights
- 2. Retain the firm of Lewis B. Freeman & Partners, Inc. to provide accounting and case administration services.
- 3. Pay the cost of certain former employees of the Robbes law firms who are familiar with the computer programs that are necessary to inventory and evaluate the clients files and assist in client communication and case administration and paralegals who are familiar with the clients' files.

- 4. Pay certain expenses necessary to preserve the clients cases in good standing, such as rent on the warehouse where the files are stored, computer costs etc.
- 5. Retain inventory attorney's law firm, TEW CARDENAS REBAK KELLÓGG LEHMAN DEMARIA TAGUE RAYMOND & LEVINE, L.L.P., as his counsel in this matter.

DONE AND ORDERED in Chambers, Miami, Dade County, Florida, on this / day of

A**vilci** February, 2003.

CIRCUIT COURTYUDG

JUDØE JOSEPH P. FARINA

ce: Nicholas N. Friedman, Esq.
Kalish Sankel, Esq.
Randolph M. Brombacher, Esq.
Lewis B. Freeman, Esq.
John A. Boggs, Esq.
Andrew M. Leinoff, Esq.,
Robert A. Schatzman, Esq.,
Linda McCann Hake
Jerry Markowitz
Linda Kelly Kearson, Esq.
Allison Day, Esq.
Thomas F. Emmick

Louis S. Robles Thomas Tew, Esq. Jeffrey Tew, Esq.

FORESTIMENT AND OHIC AMOUNT